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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

In the Matter of)
)
Amendment to the Commission's)
Regulatory Policy Governing)
Domestic Fixed Satellite and)
Separate International Satellite)
Systems)

IB Docket No. 95-41

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Comments of Rockwell International Corporation

Pursuant to Section 1.415 of the Federal Communications Commission ("the Commission") Rules and Regulations, Rockwell International Corporation ("Rockwell") hereby submits an original and nine copies of Comments on the Notice of Proposed Rulemaking ("NPRM") regarding the Commission's Regulatory Policy Governing Fixed Satellite and Separate International Satellite Systems.

INTRODUCTION

Rockwell is a diversified high technology company that manufactures a wide variety of radio frequency devices for the fixed, mobile, satellite, maritime and aeronautical services. Rockwell also provides mobile satellite service ("MSS"), currently using leased space segment capacity, as a component of its multi-mode fleet management service. As a purchaser of space segment capacity, Rockwell agrees with the Commission's goals in this

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NPRM, namely, to foster “increased competition, increased consumer choice and further development of the global information infrastructure”.

DISCUSSION

Rockwell supports the Commission’s proposal to eliminate the distinctions between the Transborder and Separate Systems policies and place all U.S.-licensed geostationary fixed satellites under a single regulatory regime. Further, Rockwell believes that U.S.-licensed geostationary satellite systems providing MSS should be permitted to provide domestic and international services on a co-primary basis subject to international coordination obligations.¹ These changes are a simple and straightforward means for introducing new competition into existing domestic and international markets. Increased competition will have the beneficial effect of lowering service costs and making fixed and mobile satellite services and technologies available to a broader range of consumers.

The Commission requested comments on whether Inmarsat and other non-U.S. owned and operated satellite systems should be permitted to service the U.S. domestic market. While we acknowledge that coordination issues remain unresolved with respect to Inmarsat, Rockwell supports the policy of fair and fully competitive worldwide markets for satellite services and, therefore, believes that Inmarsat should be able to participate in all markets. With regard to concerns that Inmarsat would have unfair advantages because of its international structure and ownership by multiple national governments, protections against anti-competitive behavior could be formulated to allow Inmarsat’s participation in the U.S. domestic MSS market.

Rockwell also believes that the Commission should permit satellite systems owned and operated by foreign companies to serve the U.S. domestic market when the foreign satellite service provider’s domestic market is accessible to U.S. providers of like satellite services. Foreign-based providers seeking to serve the U.S. domestic market should also

¹ Rockwell takes no position on the regulation of direct broadcast service.

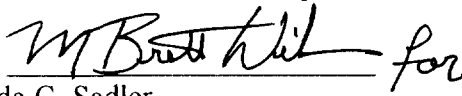
be subject to the same rigorous technical requirements imposed on U.S.-based providers. In addition to fostering competition at home, allowing the U.S. domestic market to be open to foreign-based providers should lead to the relaxation of operational and licensing restrictions in other nations. This is particularly important to the success of U.S. and foreign non-geostationary satellite systems which are inherently international in nature.

CONCLUSION

Rockwell supports the NPRM's stated goals of increasing competition and consumer choice in satellite services and furthering the development of the global information infrastructure. The proposals to eliminate the distinctions between the Transborder and Separate Systems policies, to treat all U.S.-licensed fixed geostationary satellite systems under a single regulatory regime and to allow U.S.-licensed MSS operators to provide U.S. domestic and international service are positive steps toward achieving fully competitive markets that will benefit consumers of these services. In order to realize the NPRM's stated goals in a timely manner, the Commission should permit Inmarsat, with the proper safeguards against anti-competitive behavior, to offer MSS space segment capacity to the U.S. domestic market. Further, the Commission should permit foreign owned and operated satellite systems to serve the U.S. domestic market when the foreign system's domestic market is accessible to similar U.S. systems and under the same technical rules imposed on U.S. systems.

Respectfully Submitted,

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